

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Debtor.

IRVING H. PICARD, Trustee for the  
Liquidation of Bernard L. Madoff  
Investment Securities LLC,

Plaintiff,

v.

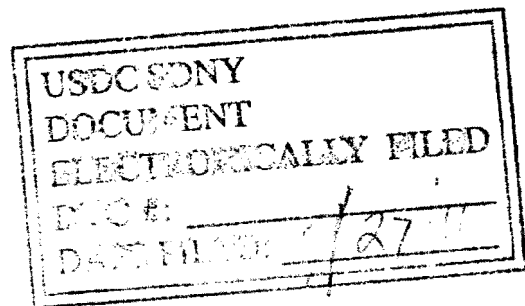
SONJA KOHN a/k/a SONJA BLAU  
KÔHN a/k/a SONJA BLAU a/k/a SINJA  
KÔHN a/k/a SINJA BLAU a/k/a SINJA  
TÜRK, ERWIN KOHN, NETTY BLAU,  
ROBERT ALAN KOHN, RINA  
HARTSTEIN (NÉE KOHN), MOISHE  
HARTSTEIN, MORDECHAI LANDAU,  
ERKO, INC., EUROVALEUR, INC.,  
INFOVALEUR, INC., TECNO  
DEVELOPMENT & RESEARCH S.R.L.,  
TECNO DEVELOPMENT & RESEARCH  
LTD., SHLOMO (MOMY) AMSELEM,  
HASSANS INTERNATIONAL LAW  
FIRM, HERALD ASSET MANAGEMENT  
LTD., 20:20 MEDICI AG f/k/a BANK  
MEDICI AG, PETER SCHEITHAUER,  
ROBERT REUSS, UNICREDIT BANK  
AUSTRIA AG, GERHARD RANDA,  
STEFAN ZAPOTOCKY, BANK  
AUSTRIA WORLDWIDE FUND  
MANAGEMENT LTD., URSULA  
RADEL-LESZCZYNSKI, UNICREDIT  
S.P.A., ALESSANDRO PROFUMO,

Adv. Pro. No. 08-1789 (BRL)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-5411 (BRL)



No. 11 Civ. 1181 (JSR)

PIONEER GLOBAL ASSET  
MANAGEMENT, S.P.A., et al., :

Defendants :

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**STIPULATION AND CONSENT ORDER**

WHEREAS, on June 3, 2011 this Court issued an order (the "Withdrawal Order") withdrawing the reference of adversary proceeding No. 10-5411 (BRL) from the Bankruptcy Court for the purpose of resolving certain specified issues (the "Withdrawal Issues") set forth in the Withdrawal Order;

WHEREAS, the Withdrawal Order set a schedule for movant UniCredit S.p.A. and non-movants Trustee (as defined in the Withdrawal Order) and the Securities Investor Protection Corporation to submit briefs addressing the Withdrawal Issues (the "Motion") and further set a schedule for oral argument before the Court regarding the Motion;

WHEREAS, certain defendants in addition to UniCredit S.p.A. have requested the consent of the Trustee to participate in the Motion pursuant to the same schedule set forth in the Withdrawal Order, and the Trustee has consented thereto.

IT IS HEREBY STIPULATED AND AGREED by the undersigned counsel as follows:

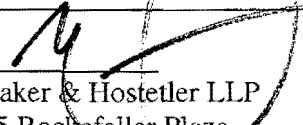
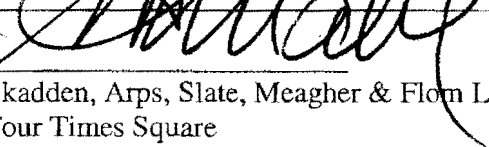
1. Defendants Pioneer Global Asset Management, S.p.A. ("PGAM"), UniCredit Bank Austria AG ("BA"), and Alessandro Profumo may participate in the Motion on the schedule set forth in the Withdrawal Order, and shall be bound by the Court's ruling on the issues addressed therein;

2. BA acknowledges service of Summons and Complaint and waives any objection to the sufficiency of such service;

3. The time which BA may move, answer, or otherwise respond to the Amended Complaint or to appear or respond in the Action as to non-Withdrawal Issues is adjourned until 60 days following the Court's issuance of an order deciding the Motion;

4. All parties to the Motion reserve, and specifically do not waive, any arguments and defenses (including, without limitation, jurisdictional defenses) beyond the permitted scope of the Motion, as set out in the Withdrawal Order; and

5. To facilitate filing, the parties agree that electronic of pdf versions of their respective signatures shall be regarded as originals for purposes of this stipulation.

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<i>Attorneys for Irving H. Picard, Trustee  for the Substantively Consolidated SIPA  Liquidation of Bernard L. Madoff  Investment Securities LLC and Bernard  L. Madoff</i>	<i>Attorneys for Defendants UniCredit S.p.A.  and Pioneer Global Asset Management  S.p.A.</i>

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<p><i>Attorneys for UniCredit Bank Austria AG</i></p>	<p><i>Attorneys for Defendant Alessandro Profumo.</i></p>
<p>DATED: July <u>26</u> 2011 New York, New York</p>	<p>SO ORDERED:</p> <p><u>Honorable Jed S. Rakoff</u> United States District Judge</p>

<p><u>Sullivan &amp; Worcester LLP</u> 1290 Avenue of the Americas New York, New York 10104 Telephone: (212) 660-3037 Facsimile: (212) 660-3001 Franklin Velie Email: <a href="mailto:fvelie@sandw.com">fvelie@sandw.com</a> Jonathan G. Kortmansky Email: <a href="mailto:jkortmansky@sandw.com">jkortmansky@sandw.com</a></p>	<p><u>Eliot Lauer</u> Curtis, Mallet-Prevost, Colt &amp; Mosle LLP 101 Park Avenue New York, NY 10178 Telephone: (212) 696-6192 Facsimile: (212) 697-1559 Eliot Lauer Email: <a href="mailto:Elauer@curtis.com">Elauer@curtis.com</a> Jennifer L. Ryan Email: <a href="mailto:jryan@curtis.com">jryan@curtis.com</a></p>
<p><i>Attorneys for UniCredit Bank Austria AG</i></p>	<p><i>Attorneys for Defendant Alessandro Profumo.</i></p>
<p>DATED: July <u>26</u>, 2011 New York, New York</p>	<p>SO ORDERED:  <u>Jed S. Rakoff</u> Honorable Jed S. Rakoff United States District Judge</p>